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VIA ECF

June 27, 2023

Hon. Judge Honorable Eric N. Vitaliano
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: *Cynthia Lochnicki, et. al. v. Planned Building Services, Inc., et. al.*,
No. 1:23-cv-02822-ENV-SJB

To The Honorable Judge Vitaliano:


This office represents plaintiffs Cynthia Lochnicki and Chequwan Potter in the above captioned action. I submit this letter to kindly request a second extension of time to respond to defendants Planned Building Services, Inc., Planned Security Services, Inc. and Planned Lifestyle Services, Inc.'s ("Defendants") letter motion requesting a pre-motion conference in advance of Defendants' anticipated Motion to Dismiss and/or Compel Arbitration, filed at ECF # 6 on June 9, 2023.

On June 20, 2023, Your Honor granted Plaintiffs a one-week extension, adjourning the deadline to June 26, 2023.

I write now to respectfully request another extension, allowing Plaintiffs to file their response on or before July 5, 2023. Defendants consent to this request.

I thank the Court for its time and attention to this matter.

Respectfully submitted,



Mohammed Gangat, Esq.